

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION

STATE OF TEXAS, ET AL.;

Plaintiffs,

v.

Case No. 1:18-cv-00068

UNITED STATES OF AMERICA, ET AL.;

Defendants,

and

KARLA PEREZ, ET AL.;

STATE OF NEW JERSEY,

Defendants-Intervenors.

**PLAINTIFF STATES' UNOPPOSED MOTION FOR LEAVE TO EXCEED PAGE
LIMIT ON THEIR MOTION FOR SUMMARY JUDGMENT**

Plaintiff States respectfully request that the Court grant permission to exceed the 20-page briefing limit by 30 pages in their Motion for Summary Judgment. Plaintiff States' Motion for Summary Judgment raises complex issues in a case of national importance, and Plaintiff States require these extra pages to adequately present these issues to the Court. Plaintiff States seek this extension for good cause and in the interest of justice, not for delay, and no party will be prejudiced if the extension is granted. The other parties do not oppose the request.

CONCLUSION

Plaintiff States respectfully request that the Court grant their motion for leave to exceed page limits.

Date: January 31, 2023

STEVE MARSHALL
Attorney General of Alabama

TIM GRIFFIN
Attorney General of Arkansas

KRIS KOBACH
Attorney General of Kansas

JEFF LANDRY
Attorney General of Louisiana

LYNN FITCH
Attorney General of Mississippi

MIKE HILGERS
Attorney General of Nebraska

ALAN WILSON
Attorney General of South Carolina

PATRICK MORRISEY
Attorney General of West Virginia

Respectfully submitted.

KEN PAXTON
Attorney General of Texas

BRENT WEBSTER
First Assistant Attorney General

/s/ Leif A. Olson
LEIF A. OLSON
Chief, Special Litigation Division
Texas Bar No. 24032801
Southern District of Texas Bar No. 33695

WILLIAM T. THOMPSON
Special Counsel
Attorney-in-Charge
Texas Bar No. 24088531
Southern District of Texas Bar No. 3053077

RYAN D. WALTERS
Special Counsel
Texas Bar No. 24105085
Southern District of Texas Bar No. 3369185

Special Litigation Division
P.O. Box 12548 (MC-009)
Austin, Texas 78711-2548
Phone: (512) 936-2714
Fax: (512) 457-4410
leif.olson@oag.texas.gov
will.thompson@oag.texas.gov
ryan.walters@oag.texas.gov

Counsel for Plaintiff States

CERTIFICATE OF CONFERENCE

I certify that on January 30, 2023, counsel for Plaintiff States conferred with counsel for the other parties in this case via email.

James Walker, counsel for Defendants United States of America, et al., Nina Perales, counsel for Defendant-Intervenors Karla Perez, et al., and Mayur Saxena, counsel for Defendant-Intervenor State of New Jersey, represented that the parties whom they represent, respectively, do not oppose the relief requested by Plaintiff States.

/s/ Leif A. Olson
LEIF A. OLSON

CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the foregoing document was filed and served electronically (via CM/ECF) on January 31, 2023.

/s/ Leif A. Olson
LEIF A. OLSON